

EPA REGISTRATION NUMBER 19713-600 - Part 1

Material to be added to a Mini-Jacket
(in the case where an e-Jacket exists)

Reg. No. 19713-600

Send to SIG: check box ☒

This material is:

- ☒ New stamped-accepted label
- ☐ New CSF
- ☐ Notification
- ☐ Final Printed Label
- ☐ Other: _____

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Phil Errico

Phone: 203-305-6663 Division: RD

Date: 2/2/09



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

February 2, 2009

Ms. Luz G. Chan
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

Ms. Chan:

RE: DREXEL PENIDMETHALIN TECHNICAL, EPA REG. NO. 19713-600, LABEL
AMENDMENT

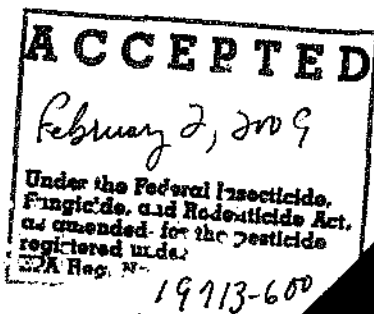
Your revised label for Drexel Pendimethalin Technical, with EPA Reg. No. 197813-600, dated stamped January 27, 2009 is acceptable. A stamped copy of the label without comments is enclosed for your records.

Please call/email Phil Errico at 703-305-6663/ Errico.Philip@epa.gov for any additional assistance in this matter.

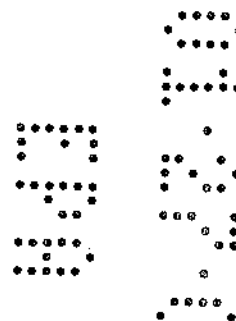
Kind Regards

A handwritten signature in cursive script, reading "Philip V. Errico".

James A. Tompkins, PM-25
Herbicide Branch/Registration Div. 7505-P



Drexel



Pendimethalin Technical

Herbicide

For manufacturing use only.

ACTIVE INGREDIENT:

Pendimethalin 96.0%

OTHER INGREDIENTS: 4.0%

TOTAL: 100.0%

Contains nitrosoamines at levels less than 100 ppm.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

EPA Reg. No. 19113-600

EPA Est. No. 19113-

Net Content: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.

Note: Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, OR EXPOSURE) CALL CHEMTREC: 1-800-424-9300

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority.

For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or residues.

Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Each formulator is responsible for obtaining EPA registration for their formulated product(s).

Only for formulation into a herbicide for the following uses:

Alfalfa, Corn (Field, Pop, Sweet), Garlic, Grass grown for seed, Landscape or Ground maintenance, Noncropland areas, Ornamentals, Onions (Dry bulb, Green, Welsh), Peanuts, Sorghum (grain), Sugarcane, Sunflower, and Turfgrasses.

This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.

CONTAINER DISPOSAL:

Nonrefillable Container (Rigid--Greater than 50 Lbs.): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least once complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

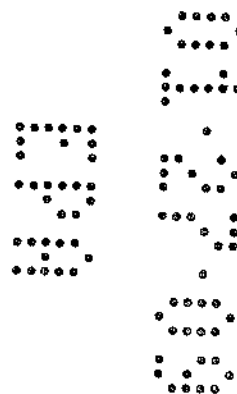
Refillable Container: Refillable container. Refill this container with this product only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining content from this container into mixing container. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into mixing container or rinsate collection system. Repeat this rinsing procedure two more times.

WARRANTY—CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE expressed or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. To the extent consistent with applicable law, Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with directions given herewith.



Manufactured By:
Drexel Chemical Company
P.O. BOX 13327, MEMPHIS, TN 38113-0327
SINCE 1972





Drexel Chemical Company

December 18, 2008

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive
Arlington, VA 22202
(Tel. 703 305-5263)

ATTN: Jim Tompkins, PM 25, Herbicide Branch

Re: *Submission of Label Amendment to Add Crops*
DREXEL PENDIMETHALIN TECHNICAL (EPA Reg. No. 19713-600)

Dear Mr. Tompkins,

Our company would like to submit an application to amend the label of the above product to add alfalfa, corn (field, sweet), garlic, onions, peanuts, sorghum (grain), sugarcane, and sunflower. Tolerance exists for these said crops and it is our understanding that no additional risk assessment will be necessary to add these use sites onto the above label.

In support of the above, herewith:

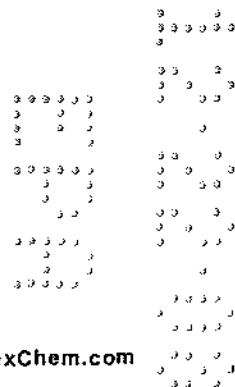
1. Completed EPA Form 8570-1
2. Certification with respect to citation of data
3. Data matrix
4. Five copies of the proposed label (539SP-1208Pending)

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY

Luz G Chan
Registration Manager



"Luz Chan"
<lchan@drexchem.com>
01/27/2009 10:59 AM

To Philip Errico/DC/USEPA/US@EPA
cc
bcc
Subject RE: Drexel Pendimethalin Technical (19713-600)

Yes, Sir! We will take up your offer. Any addition is a plus.

Attached please find the revised label (marked up and clean label) adding popcorn, green and welsh onion for your approval.

Philip, I really thank you so very much for your help!

With kind regards,

Luz G Chan
(901) 774-4370

-----Original Message-----

From: Errico.Philip@epamail.epa.gov
[mailto:Errico.Philip@epamail.epa.gov]
Sent: Tuesday, January 27, 2009 9:15 AM
To: Luz Chan
Subject: Re: Drexel Pendimethalin Technical (19713-600)

Hi Luz,
Yes, there is a tolerance for popcorn grain, but there is no tolerance for popcorn forage and stover, the plant material remaining after harvest of the grain. This forage can be feed to livestock, especially in years when feed is limited. We don't allow a restriction against feeding this forage to livestock, because it is not considered practical. There are popcorn uses on other pendimethalin labels. Also, the Agency has determined that there is no reasonable expectation of finite pendimethalin residues of concern in animal commodities (40CFR180.6(a)(3)), so there are no tolerances established in meat and milk for pendimethalin. Therefore, there is no risk if the tolerances are the same as field corn and sweet corn forage and stover. If your Company wants to keep the popcorn use on the label for the technical, let me know. We can deal with the no tolerance situation on popcorn forage and stover for the end-use label later. For technical reasons, I tried to have SRRD establish a tolerance for popcorn forage and stover using field corn forage and stover residue data when they were making changes to the tolerances for pendimethalin per the reregistration document, but they didn't do it. Apparently there is a misunderstanding of what popcorn tolerances HED recommended in the RED for popcorn forage and stover, even though they specifically recommended a tolerance for popcorn grain.

If you decide to add popcorn to your technical label, please email another copy of a revised label containing this crop. The addition for the technical would be field corn, popcorn, and sweet corn. Also, the tolerance for dry bulb onion has been revised to bulb onion, green onion, and welsh onion. So these can also be added in place of dry bulb onion, if you wish.

Thanks.

Philip V. Errico, Senior Chemist
U. S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division/Herbicide Branch (7505C)
Phone: 703-305-6663
Fax: 703-308-1825
Email: Errico.Philip@epa.gov

"Luz Chan"
<lchan@drexchem.
com>

01/26/2009 12:23
PM

To
Philip Errico/DC/USEPA/US@EPA
cc
Subject
Drexel Pendimethalin Technical
(19713-600)

Dear Philip,

Thank you so very much for the good news that you have given me this morning. It's surely a good way to start my week.

Please find the revised label (one marked up copy and one clean copy) for your review.

I have also attached a copy of 40 CFR 180.361 for Pendimethalin showing a residue tolerance for Popcorn. I humbly request for your reconsideration that we be allowed to add this on our label. If your decision is positive, just please let me know and I'll resubmit the label to you.

Again, I thank you so very much. I really do appreciate your immediate action on this submission.

With kind regards,

Luz G Chan
(Tel. 901 774-4370) (See attached file: 600SP-0109(asteriks)Pending.pdf)
(See attached file: 600SP-0109(asteriks)Pending.pdf) (See attached file:
Document (25).pdf)



600SP-0109(asteriks)Pending.pdf 600SP-0109(asteriks)Pending.pdf

"Luz Chan"
<lchan@drexchem.com>
01/26/2009 12:23 PM

To Philip Errico/DC/USEPA/US@EPA
cc
bcc

Subject Drexel Pendimethalin Technical (19713-600)

History:  This message has been replied to.

Dear Philip,

Thank you so very much for the good news that you have given me this morning. It's surely a good way to start my week.

Please find the revised label (one marked up copy and one clean copy) for your review.

I have also attached a copy of 40 CFR 180.361 for Pendimethalin showing a residue tolerance for Popcorn. I humbly request for your reconsideration that we be allowed to add this on our label. If your decision is positive, just please let me know and I'll resubmit the label to you.

Again, I thank you so very much. I really do appreciate your immediate action on this submission.

With kind regards,

Luz G Chan



(Tel. 901 774-4370) 600SP-0109(asteriks)Pending.pdf 600SP-0109(asteriks)Pending.pdf 00cument (25).pdf

Erik Kraft/DC/USEPA/US
01/08/2009 08:05 AM

To Philip Errico/DC/USEPA/US@EPA
cc "Luz Chan" <lchan@drexchem.com>
bcc

Subject Fw: Pendimethalin Technical (19713-600) Amendment
Submission Received by EPA 12/22/2008

History:  This message has been replied to.

Phil,

I look in OPPIN and this action is assigned to you. Please look at the email below for a new label.

Erik

----- Forwarded by Erik Kraft/DC/USEPA/US on 01/08/2009 08:04 AM -----

"Luz Chan"
<lchan@drexchem.com>
01/07/2009 04:42 PM

To Erik Kraft/DC/USEPA/US@EPA
cc
Subject Pendimethalin Technical (19713-600) Amendment
Submission Received by EPA 12/22/2008

Hi, Erik.

Happy new year to you.

Follow up to my telephone call to you, attached is the replacement label (600SP-0109(Pending) for our above submission.

I revised the statement above the ingredient to "For manufacturing use only" and I removed the reference to CHEMTREC in the Storage and Disposal Statements.

Thank you for your help.



Luz 600SP-0109 Pending.pdf

Drexel

Pendimethalin Technical

Herbicide

For manufacturing use only.

ACTIVE INGREDIENT:

Pendimethalin 96.0%

OTHER INGREDIENTS: 4.0%

TOTAL: 100.0%

Contains nitrosoamines at levels less than 100 ppm.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

EPA Reg. No. 19713-600

EPA Est. No. 19713-

Net Content: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.

Note: Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, OR EXPOSURE) CALL CHEMTREC: 1-800-424-9300

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority.

For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or residues.

Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Each formulator is responsible for obtaining EPA registration for their formulated product(s).

Only for formulation into a herbicide for the following uses:

Alfalfa, Corn, Garlic, Grass grown for seed, Landscape or Ground maintenance, Noncropland areas, Ornamentals, Onions, Peanuts, Sorghum (grain), Sugarcane, Sunflower, and Turfgrasses.

This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.

CONTAINER DISPOSAL:

Nonrefillable Container (Rigid—Greater than 50 Lbs.): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least once complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Refillable Container: Refillable container. Refill this container with this product only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining content from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

WARRANTY—CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty, nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE expressed or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. To the extent consistent with applicable law, Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with directions given herewith.



Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972

Receipt for Section 3

S: 642214

Regulatory Type: Product Registration - Section 3

Application Type: Amendment

Company: 19713 DREXEL CHEMICAL COMPANY

Risk Manager: Registration Division, Risk Management Team 25

Product #: 19713-600 Product Name: PENDIMETHALIN TECHNICAL

Me Too Section3: Me Too Product Name:

Application Date: 18-Dec-2008 OPP Rec'd Date: 22-Dec-2008

Front End Date: 29-Dec-2008 Risk Manager Send Date: 30-Dec-2008

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: New Ingredient:

Receipt Description: Label amendment to add crops

Form 15: Signature Date: Form 16: Signature Date:

Print Letter

Enter More Information

Tracking

View/Edit

Code as Non Fast Track Because Selection didn't

Lead

VE

for 12 40



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 30, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

LUZ G. CHAN
DREXEL CHEMICAL COMPANY
1700 CHANNEL AVENUE, PO Box 13327
MEMPHIS, TN 38113-0327

PRODUCT NAME: PENDIMETHALIN TECHNICAL
COMPANY NAME: DREXEL CHEMICAL COMPANY
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 19713-600
EPA RECEIPT DATE: 12/22/08

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 25, at (703) 305-5697.

Sincerely,

A handwritten signature in cursive script, appearing to read "P. H. Moore", is written above the typed name.

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{842214v~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 25

Receipt No.

S- 842214

EPA File Symbol/Reg. No.

19713-600

Pin-Punch Date:

12/22/2008

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *[Signature]*

Date: 12/29/08

Remarks:

ACCEPTED
with COMMENTS
in EPA Letter Dated

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticides
registered under EPA Reg. No.

19713-600

DEC 27 2006

Drexel

Pendimethalin Technical

Herbicide

For use in Turfgrasses, Ornamentals, Landscape or
Grounds Maintenance, Grass Grown for Seed, and
Noncropland Areas

ACTIVE INGREDIENT:

Pendimethalin 96.0%

OTHER INGREDIENTS: 4.0%

TOTAL: 100.0%

Contains nitroscamines at levels less than 100 ppm.

KEEP OUT OF REACH OF CHILDREN CAUTION

See FIRST AID Below

EPA REG. NO. 19713-_____

EPA EST. NO. _____

Net Contents: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.

Note: Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-T378.

FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, OR EXPOSURE)
CALL CHEMTREC: 1-800-424-9300

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, Drum may retain solid, liquid, and/or residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Each formulator is responsible for obtaining EPA registration for their formulated product(s).

Only for formulation into a herbicide for the following uses:

Grass grown for seed, Landscape or Ground maintenance, Noncropland areas, Ornamentals, and Turfgrasses.

This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food, or feed, by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.

CONTAINER DISPOSAL:

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Open dumping is prohibited.

WARRANTY - CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE express or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input checked="" type="checkbox"/>	Amendment
<input type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-600	2. EPA Product Manager JIM TOMPKINS	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PENDIMETHALIN TECHNICAL	PM# 25/Herbicide Branch	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>241-245</u> Product Name <u>Prowl Technical</u>	

Section - II

<input checked="" type="checkbox"/>	Amendment - Explain below.	<input type="checkbox"/>	Final printed labels in response to Agency letter dated _____
<input type="checkbox"/>	Resubmission in response to Agency letter dated _____	<input type="checkbox"/>	"Ma Too" Application.
<input type="checkbox"/>	Notification - Explain below.	<input type="checkbox"/>	Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of revised label to add alfalfa, corn (field, sweet), garlic, onions, peanuts, sorghum (grain), sugarcane, and sunflower. Details are in the cover letter accompanying this submission.

Thank you.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	
Certification must be submitted		If "Yes" Unit Packaging wgt.		No. per container	
		If "Yes" Package wgt		No. per container	
2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____					
3. Location of Net Contents Information		4. Size(s) Retail Container		5. Location of Label Directions	
<input type="checkbox"/> Label <input type="checkbox"/> Container				<input type="checkbox"/> _____	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
		<input type="checkbox"/> Other _____			

Section - IV

t. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name LUZ G CHAN	Title REGISTRATION MANAGER	Telephone No. (Include Area Code) (901) 774-4370
--------------------	-------------------------------	---

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

<p align="center">Certification</p> <p>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</p>		<p>6. Date Application Received (Stamp) 12/18/2008</p>
<p>2. Signature</p> <p><i>Luiz G Chan</i> 2008.12.18 10:25:31 -06'00'</p>	<p>3. Title</p> <p>REGISTRATION MANAGER</p>	
<p>4. Typed Name</p> <p>LUZ G CHAN</p>	<p>5. Date</p> <p>December 18, 2008</p>	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Drexel Chemical Company, P.O. Box 13327, Memphis, TN 38113-0327 (Tel 901 774-4370)	EPA Registration Number/File Symbol 19713-600
Active Ingredient(s) and/or representative test compound(s) Pendimethalin	Date December 18, 2008
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial food crops	Product Name DREXEL PENDIMETHALIN TECHNICAL

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

Addition of use sites

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Luiz G Chan</i>	2008.12.18 11:00:33 -06'00'	Date Dec. 18, 2008	Typed or Printed Name and Title LUZ G CHAN, Registration Manager
---------------------------------	--------------------------------	-----------------------	---

Drexel

Pendimethalin Technical

Herbicide

For use in listed Agricultural crops, Turfgrasses, Ornamentals, Landscape or Grounds Maintenance, Grass Grown for Seed, and Non-cropland Areas

ACTIVE INGREDIENT:

Pendimethalin	96.0%
OTHER INGREDIENTS:	4.0%
TOTAL:	100.0%

Contains nitroscamines at levels less than 100 ppm.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

EPA Reg. No. 19713-600

EPA Est. No. 19713-

Net Content: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.

Note: Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, OR EXPOSURE) CALL CHEMTREC: 1-800-424-9300

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge

effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or residues.

Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Each formulator is responsible for obtaining EPA registration for their formulated product(s).

Only for formulation into a herbicide for the following uses:

Alfalfa, Corn (field, sweet), Garlic, Grass grown for seed, Landscape or Ground maintenance, Noncropland areas, Ornamentals, Onions, Peanuts, Sorghum (grain), Sugarcane, Sunflower, and Turfgrasses. This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.

CONTAINER DISPOSAL:

Nonrefillable Container (Rigid—Greater than 50 Lbs.): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least once complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Refillable Container: Refillable container. Refill this container with this product only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining content from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

FOR 24-HOUR EMERGENCY ASSISTANCE (SPILL, LEAK, OR FIRE), CALL CHEMTREC AT 1-800-424-9300

WARRANTY—CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty, nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE expressed or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. To the extent consistent with applicable law, Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with directions given herewith.



Manufactured By:
Drexel Chemical Company
P.O. BOX 13327, MEMPHIS, TN 38113-0327
SINCE 1972

Drexel

Pendimethalin Technical

Herbicide

For use in listed Agricultural crops, Turfgrasses, Ornamentals, Landscape or Grounds Maintenance, Grass Grown for Seed, and Non-cropland Areas

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Pendimethalin	96.0%
OTHER INGREDIENTS:	4.0%
TOTAL:	100.0%

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EPA Reg. No. 19713-600

EPA Est. No. 19713-

Net Content: _____

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effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or residues.

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20

600SP-1208 (Pending)

WARRANTY—CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty, nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE expressed or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. To the extent consistent with applicable law, Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with directions given herewith.



Manufactured By:
Drexel Chemical Company
P.O. BOX 13327, MEMPHIS, TN 38113-0327
SINCE 1972



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date December 18, 2008			EPA Reg No./File Symbol 19713-600		Page 1 of 16
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
121-1	Target area phytotoxicity	00003376	Mobil Chemical Co.	Old	
121-1	Target area phytotoxicity	00003484	Mobil Chemical Co.	Old	
121-1	Target area phytotoxicity	00003499	Mobil Chemical Co.	Old	
121-1	Target area phytotoxicity	00003511	Mobil Chemical Co.	Old	
121-1	Target area phytotoxicity	00004187	Mobil Chemical Co.	Old	
121-1	Target area phytotoxicity	00014347	Mobil Chemical Co.	Old	
121-1	Target area phytotoxicity	00016334	Syngenta Crop Protection	Old	
121-1	Target area phytotoxicity	00016895	Syngenta Crop Protection	Old	
121-1	Target area phytotoxicity	00017049	Syngenta Crop Protection	Old	
121-1	Target area phytotoxicity	00017053	Syngenta Crop Protection	Old	
121-1	Target area phytotoxicity	00017140	Syngenta Crop Protection	Old	
121-1	Target area phytotoxicity	00017151	Syngenta Crop Protection	Old	
121-1	Target area phytotoxicity	00071155	Syngenta Crop Protection	Old	
121-1	Target area phytotoxicity	00017298	Syngenta Crop Protection	Old	
121-1	Target area phytotoxicity	00017513	Syngenta Crop Protection	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



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WASHINGTON, D.C. 20460

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Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
121-1	Target area phytotoxicity	00017525	BASF	Old	
121-1	Target area phytotoxicity	00018746	BASF	Old	
121-1	Target area phytotoxicity	00023159	BASF	Old	
121-1	Target area phytotoxicity	00023761	BASF	Old	
121-1	Target area phytotoxicity	00023762	BASF	Old	
121-1	Target area phytotoxicity	00025049	BASF	Old	
121-1	Target area phytotoxicity	00026965	BASF	Old	
121-1	Target area phytotoxicity	00026969	BASF	Old	
121-1	Target area phytotoxicity	00028532	BASF	Old	
121-1	Target area phytotoxicity	00029539	Mobil Chemical Co.	Old	
121-1	Target area phytotoxicity	00029729	BASF	Old	
121-1	Target area phytotoxicity	00029731	BASF	Old	
121-1	Target area phytotoxicity	00029788	BASF	Old	
121-1	Target area phytotoxicity	00030694	BASF	Old	
121-1	Target area phytotoxicity	00032424	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date December 18, 2008		EPA Reg No./File Symbol 19713-600		Page 3 of 16	
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327		Product DREXEL PENDIMETHALIN TECHNICAL			
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
121-1	Target area phytotoxicity	00032431	BASF	Old	
121-1	Target area phytotoxicity	00106787	BASF	Old	
121-1	Target area phytotoxicity	00106792	BASF	Old	
121-1	Target area phytotoxicity	00106817	BASF	Old	
121-1	Target area phytotoxicity	00106827	BASF	Old	
121-1	Target area phytotoxicity	00133093	BASF	Old	
161-1	Hydrolysis	00046287	BASF	Old	
161-1	Hydrolysis	00046296	BASF	Old	
161-2	Photodegradation in water	00153763	BASF	Old	
161-3	Photodegradation in soil	00046296	BASF	Old	
161-3	Photodegradation in soil	00137706	BASF	Old	
162-1	Aerobic soil metabolism	00153764	BASF	Old	
162-1	Aerobic soil metabolism	40185104	BASF	Old	
162-2	Anaerobic soil metabolism	00151795	BASF	Old	
164-1	Terrestrial field dissipation	00106805	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



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Date December 18, 2008			EPA Reg No./File Symbol 19713-600		Page 4 of 16
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
164-1	Terrestrial field dissipation	00106806	BASF	Old	
165-1	Confined rotational crop	41806801	BASF	Old	
171-4B	Nature of residue, livestock	4306824	BASF	Old	
171-4B	Nature of residue, livestock	43147801	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591201	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591202	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591204	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591205	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591206	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591207	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591208	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591209	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591210	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591211	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591212	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



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Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327		Product DREXEL PENDIMETHALIN TECHNICAL			
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name <i>Study Data</i>	MRID Number	Submitter <i>submitted</i>	Status	Note
171-4C; 860.1500	Residue, analytical method	46591213	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591214	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591215	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591216	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591217	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591218	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591219	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591220	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591221	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591222	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591223	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591224	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591225	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591226	BASF	Old	
171-4C; 860.1500	Residue, analytical method	46591227	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date December 18, 2008		EPA Reg No./File Symbol 19713-600		Page 6 of 16	
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327		Product DREXEL PENDIMETHALIN TECHNICAL			
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
171-4C; 860.1500	Residue, analytical method; Crop field trials	46591228	BASF	Old	
171-4C; 860.1500	Residue, analytical method; Crop field trials	46591229	BASF	Old	
171-4C; 860.1500	Residue, analytical method; Crop field trials	46591230	BASF	Old	
171-4A2	Nature of residue	00148081	BASF	Old	
171-4B	Nature of residue, livestock	00023780	BASF	Old	
171-4B	Nature of residue, livestock	00023782	BASF	Old	
171-4B	Nature of residue, livestock	00023785	BASF	Old	
171-4B	Nature of residue, livestock	00023781	BASF	Old	
171-4B	Nature of residue, livestock	00031213	BASF	Old	
171-4B	Nature of residue, livestock	00031214	BASF	Old	
171-4B	Nature of residue, livestock	00051958	BASF	Old	
171-4B	Nature of residue, livestock	00051959	BASF	Old	
171-4B	Nature of residue, livestock	00051960	BASF	Old	
171-4B	Nature of residue, livestock	00051961	BASF	Old	
171-4B	Nature of residue, livestock	00051962	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



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Date December 18, 2008			EPA Reg No./File Symbol 19713-600		Page 7 of 16
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
171-4B	Nature of residue, livestock	00072822	BASF	Old	
171-4B	Nature of residue, livestock	00072823	BASF	Old	
171-4B	Nature of residue, livestock	00072824	BASF	Old	
171-4B	Nature of residue, livestock	00072825	BASF	Old	
171-4B	Nature of residue, livestock	00074620	BASF	Old	
171-4B	Nature of residue, livestock	42859202	BASF	Old	
171-4B	Nature of residue, livestock	42859203	BASF	Old	
171-4B	Nature of residue, livestock	42859204	BASF	Old	
171-4C	Residue, analytical method, plant	00023786	BASF	Old	
171-4C	Residue, analytical method, plant	00023787	BASF	Old	
171-4C	Residue, analytical method, plant	00023788	BASF	Old	
171-4C	Residue, analytical method, plant	00023789	BASF	Old	
171-4C	Residue, analytical method, plant	00023790	BASF	Old	
171-4C	Residue, analytical method, plant	00023791	BASF	Old	
171-4C	Residue, analytical method, plant	00023792	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



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Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327		Product DREXEL PENDIMETHALIN TECHNICAL			
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
171-4C	Residue, analytical method, plant	00023792	BASF	Old	
171-4C	Residue, analytical method, plant	00023794	BASF	Old	
171-4C	Residue, analytical method, plant	00023795	BASF	Old	
171-4C	Residue, analytical method, plant	00023796	BASF	Old	
171-4C	Residue, analytical method, plant	00025257	BASF	Old	
171-4C	Residue, analytical method, plant	00025259	BASF	Old	
171-4C	Residue, analytical method, plant	00025259	BASF	Old	
171-4C	Residue, analytical method, plant	00025364	BASF	Old	
171-4C	Residue, analytical method, plant	00030693	BASF	Old	
171-4C	Residue, analytical method, plant	00031215	BASF	Old	
171-4C	Residue, analytical method, plant	00031216	BASF	Old	
171-4C	Residue, analytical method, plant	00031217	BASF	Old	
171-4C	Residue, analytical method, plant	00031219	BASF	Old	
171-4C	Residue, analytical method, plant	00032430	BASF	Old	
171-4C	Residue, analytical method, plant	00051957	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



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DATA MATRIX

Date December 18, 2008			EPA Reg No./File Symbol 19713-600		Page 9 of 14
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
171-4C	Residue, analytical method, plant	00051963	BASF	Old	
171-4C	Residue, analytical method, plant	00074619	BASF	Old	
171-4C	Residue, analytical method, plant	00093698	BASF	Old	
171-4C	Residue, analytical method, plant	00093719	BASF	Old	
171-4C	Residue, analytical method, plant	00106785	BASF	Old	
171-4C	Residue, analytical method, plant	00106791	BASF	Old	
171-4C	Residue, analytical method, plant	00106797	BASF	Old	
171-4C	Residue, analytical method, plant	00106807	BASF	Old	
171-4C	Residue, analytical method, plant	00106820	BASF	Old	
171-4C	Residue, analytical method, plant	00106826	BASF	Old	
171-4C	Residue, analytical method, plant	00106829	BASF	Old	
171-4C	Residue, analytical method, plant	00114313	BASF	Old	
171-4C	Residue, analytical method, plant	00114314	BASF	Old	
171-4C	Residue, analytical method, plant	00115258	BASF	Old	
171-4C	Residue, analytical method, plant	00126578	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



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DATA MATRIX

Date December 18, 2008		EPA Reg No./File Symbol 19713-600		Page 10 of 16	
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327		Product DREXEL PENDIMETHALIN TECHNICAL			
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
171-4C	Residue, analytical method, plant	00129167	BASF	Old	
171-4C	Residue, analytical method, plant	00134355	BASF	Old	
171-4C	Residue, analytical method, plant	00138940	BASF	Old	
171-4C	Residue, analytical method, plant	00142809	BASF	Old	
171-4C	Residue, analytical method, plant	00143477	BASF	Old	
171-4C	Residue, analytical method, plant	00145203	BASF	Old	
171-4C	Residue, analytical method, plant	00106797	BASF	Old	
171-4C	Residue, analytical method, plant	00106807	BASF	Old	
171-4C	Residue, analytical method, plant	00106820	BASF	Old	
171-4C	Residue, analytical method, plant	00106826	BASF	Old	
171-4C	Residue, analytical method, plant	00106829	BASF	Old	
171-4C	Residue, analytical method, plant	00114313	BASF	Old	
171-4C	Residue, analytical method, plant	00114314	BASF	Old	
171-4C	Residue, analytical method, plant	00115258	BASF	Old	
171-4C	Residue, analytical method, plant	00126578	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



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Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327		Product DREXEL PENDIMETHALIN TECHNICAL			
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
171-4C	Residue, analytical method, plant	00153179	BASF	Old	
171-4C	Residue, analytical method, plant	40185102	BASF	Old	
171-4C	Residue, analytical method, plant	41827401	BASF	Old	
171-4C	Residue, analytical method, plant	42471903	BASF	Old	
171-4A2	Nature of residue, plant	00031219	BASF	Old	
171-4A2	Nature of residue, plant	00046277	BASF	Old	
171-4A2	Nature of residue, plant	00051965	BASF	Old	
171-4A2	Nature of residue, plant	00074621	BASF	Old	
171-4A2	Nature of residue, plant	00106779	BASF	Old	
171-4A2	Nature of residue, plant	00109915	BASF	Old	
171-4A2	Nature of residue, plant	00129087	BASF	Old	
171-4A2	Nature of residue, plant	41469901	BASF	Old	
171-4A2	Nature of residue, plant	42686401	BASF	Old	
171-4A3	Nature of residue, plant	00031218	BASF	Old	
171-4A3	Nature of residue, plant	00031979	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



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401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date December 18, 2008			EPA Reg No./File Symbol 19713-600		Page 12 of 16
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
171-4A3	Residue, analytical method, plant	00041897	BASF	Old	
171-4A3	Residue, analytical method, plant	00046276	BASF	Old	
171-4A3	Residue, analytical method, plant	00067288	BASF	Old	
171-4A3	Residue, analytical method, plant	00067289	BASF	Old	
171-4A3	Residue, analytical method, plant	00067290	BASF	Old	
171-4A3	Residue, analytical method, plant	00108318	BASF	Old	
171-4A3	Residue, analytical method, plant	41713901	BASF	Old	
171-4A3	Residue, analytical method, plant	42467802	BASF	Old	
860.1500	Crop field trials	46591201	BASF	Old	
860.1500	Crop field trials	46591202	BASF	Old	
860.1500	Crop field trials	46591204	BASF	Old	
860.1500	Crop field trials	46591205	BASF	Old	
860.1500	Crop field trials	46591206	BASF	Old	
860.1500	Crop field trials	46591207	BASF	Old	
860.1500	Crop field trials	46591208	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



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Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Crop field trials	46591209	BASF	Old	
860.1500	Crop field trials	46591210	BASF	Old	
860.1500	Crop field trials	46591211	BASF	Old	
860.1500	Crop field trials	46591212	BASF	Old	
860.1500	Crop field trials	46591213	BASF	Old	
860.1500	Crop field trials	46591214	BASF	Old	
860.1500	Crop field trials	46591215	BASF	Old	
860.1500	Crop field trials	46591216	BASF	Old	
860.1500	Crop field trials	46591217	BASF	Old	
860.1500	Crop field trials	46591218	BASF	Old	
860.1500	Crop field trials	46591219	BASF	Old	
860.1500	Crop field trials	46591220	BASF	Old	
860.1500	Crop field trials	46591221	BASF	Old	
860.1500	Crop field trials	46591222	BASF	Old	
860.1500	Crop field trials	46591223	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



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Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Crop field trials	46591224	BASF	Old	
860.1500	Crop field trials	46591225	BASF	Old	
860.1500	Crop field trials	46591226	BASF	Old	
860.1500	Crop field trials	46591227	BASF	Old	
860.1500	Crop field trials	46591228	BASF	Old	
860.1500	Crop field trials	46591229	BASF	Old	
860.1500	Crop field trials	46591230	BASF	Old	
123-1	Tier II plant toxicity	42372201	BASF	Old	
123-1	Tier II plant toxicity	42372202	BASF	Old	
123-1	Tier II plant toxicity	42372203	BASF	Old	
161-2	Photodegradation in water	43808201	BASF	Old	
162-3	Anaerobic aquatic metabolism	43154701	BASF	Old	
162-3	Anaerobic aquatic metabolism	43154702	BASF	Old	
163-1	Adsorption/Desorption column leaching	43041901	BASF	Old	
164-1	Terrestrial field dissipation	41725204	BASF	Old	
Signature <i>Luz G Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



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Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
164-1	Terrestrial field dissipation	41725025	BASF	Old	
164-1	Terrestrial field dissipation	41725026	BASF	Old	
165-1	Confined rotational crops	41806801	BASF	Old	
171-4A	Nature of residue of plants	41881201	BASF	Old	
171-4A	Nature of residue of plants	42467801	BASF	Old	
171-4A	Nature of residue of plants	42471902	BASF	Old	
171-4A	Nature of residue of plants	42471903	BASF	Old	
171-4A	Nature of residue of plants	42686401	BASF	Old	
171-4A	Nature of residue of plants	42858901	BASF	Old	
171-4B	Nature of residue, livestock	41713901	BASF	Old	
171-4B	Nature of residue, livestock	42467802	BASF	Old	
171-4C	Residue analytical method, plant	41594902	BASF	Old	
171-4C	Residue analytical method, plant	41881202	BASF	Old	
171-4C	Residue analytical method, plant	42859202	BASF	Old	
171-4C	Residue analytical method, plant	42859203	BASF	Old	
Signature <i>Luz G. Chan</i> 2008.12.18 10:56:46 -06'00'			Name and Title Luz G Chan, Registration Manager		Date Dec. 18, 2008



Drexel Chemical Company

January 5, 2007

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Rm S-4900
One Potomac Yard
2777 S Crystal Drive
Arlington, VA 22202

**Re: Submission of Final Label per EPA Stamped Accepted Label Dated 12/27/2006
DREXEL PENDIMETHALIN TECHNICAL (EPA Reg. No. 19713-600)**

Reference is made to the above. Herewith:

1. Completed EPA Form 8570-1.
2. One (1) copy of the final label (600SP-0107) with comments by EPA incorporated into the label.
3. Required certification statement

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY

Luz Chan
Registration Manager



United States
Environmental Protection Agency
Washington, DC 20460

	Registration
	Amendment
✓	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-600	2. EPA Product Manager JIM TOMPKINS	3. Proposed Classification <input checked="checked" type="checkbox"/> None	<input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PENDIMETHALIN TECHNICAL	PM# 25/Herbicide Branch		
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____		

Section - II

<input type="checkbox"/>	Amendment - Explain below.	<input checked="" type="checkbox"/>	Final printed labels in response to Agency letter dated <u>12/27/2006</u>
<input type="checkbox"/>	Resubmission in response to Agency letter dated _____	<input type="checkbox"/>	"Me Too" Application.
<input checked="" type="checkbox"/>	Notification - Explain below.	<input type="checkbox"/>	Other - Explain below.


Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of revised label (526ASP-1106). Details are in the cover letter accompanying this submission. The required certification statement is also submitted.
Thank you.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt No. per container	
2. Type of Container					
<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____					
3. Location of Net Contents Information		4. Size(s) Retail Container		5. Location of Label Directions	
<input type="checkbox"/> Label <input type="checkbox"/> Container				<input type="checkbox"/> _____	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point <i>(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)</i>		
Name LUZ G CHAN	Title REGISTRATION MANAGER	Telephone No. (Include Area Code) (901) 774-4370
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature  Digitally signed by Luz chan DN: cn=Luz chan, o=US, o=Dixiel Chemical Co. Date: 2007.01.05 15:19:05 -0600	3. Title REGISTRATION MANAGER	(Additional stamps and markings)
4. Typed Name LUZ G CHAN	5. Date January 5, 2007	



Drexel

Pendimethalin Technical

Herbicide

For use in Turfgrasses, Ornamentals, Landscape or Grounds Maintenance, Grass Grown for Seed, and Noncropland Areas

ACTIVE INGREDIENT:

Pendimethalin 96.0%

OTHER INGREDIENTS: 4.0%

TOTAL: 100.0%

Contains nitrosoamines at levels less than 100 ppm.

KEEP OUT OF REACH OF CHILDREN CAUTION

See FIRST AID Below

EPA REG. NO. 19713-600

EPA EST. NO. 19713-

Net Contents: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.

Note: Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, OR EXPOSURE)
CALL CHEMTREC: 1-800-424-9300

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Each formulator is responsible for obtaining EPA registration for their formulated product(s).

Only for formulation into a herbicide for the following uses:

Grass grown for seed, Landscape or Ground maintenance, Noncropland areas, Ornamentals, and Turfgrasses.

This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.

CONTAINER DISPOSAL:

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Open dumping is prohibited.

WARRANTY - CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty, nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE expressed or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. To the extent permitted by law, Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with directions given herewith.

Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972



January 5, 2007

Submission of Final Label per EPA's Letter dd. December 27, 2006 by Notification
DREXEL PENDIMETHALIN TECHNICAL (EPA Reg. No. 19713-600)

This notification is consistent with the Provisions of PR Notice 98-10 and EPA Regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

FOR DREXEL CHEMICAL COMPANY

LUZ G CHAN

Registration Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOTICE OF PESTICIDE:

x Registration

EPA Reg. Number: 19713-600

Term of Issuance: Conditional

Name of Pesticide Product: Pendimethalin Technical

Drexel Chemical Company

1700 Channel Av.

Memphis, TN 38113

This product is conditionally registered in accordance with FIFRA Section 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/ reregistration of your product under FIFRA when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA.

2. Add on the front panel, "EPA Reg. No. 19713-600" and "EPA Est. No. 19713-XX-XX."

3. Under "First Aid";

Interchange the sequence of "If on skin or Clothing" and "If in eyes" treatments.

4. Under "Warranty - Conditions of Sale";

Add "To the extent permitted by law" before "Buyer assumes all risks . . ."

Submit one (1) copy of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

CONCURRENCES

SYMBOL ▶	7505P	7505P						
SURNAME ▶	Bien	Tompkins						
DATE ▶	12-18-06	12/18/06						

DATA PACKAGE BEAN SHEET

Date: 29-Jun-2006

Page 1 of 2

Decision #: 368407

DP #: (330539)

FEE

*** Registration Information ***

Registration: 19713-ANN - PENDIMETHALIN TECHNICAL

Company: 19713 - DREXEL CHEMICAL CO

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# PY1 S-7337

Risk Manager Reviewer: Ching-Tsen Bien CBIEN

Sent Date: _____

Calculated Due Date: 01-Jan-2007

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (R31) NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMIST

Ingredients: 108501, Pendimethalin(96%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 29-Jun-2006

Due Back: _____

DP Ingredient: 108501, Pendimethalin

DP Title: Orexel Pendimethalin Technical Herbicide

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RO / TRB

Last Possible Science Due Date: 02-Dec-2006

Team Name: Chen

Science Due Date: _____

Reviewer Name: Shyam Mathy

12/16/06

12/11/06

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

The Drexel Chemical Company has a new source for pendimethalin technical. Please review the enclosed product chemistry package and determine its acceptance for registration.

MRID#: 468613-01, 468613-02

R31
#20050

DP#: (330539)

*** Studies Sent for Review ***

Decision#: (368407)

MRID	Citation Reference	Guideline
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1550/Product Identity and cor
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1600/Description of materials
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1620/Description of production
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1670/Discussion of formation
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1700/Preliminary analysis
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1750/Certified limits
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1800/Enforcement analytical
46861302	Wherry, K. (2008) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6302/Color
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6303/Physical state
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6304/Odor
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6313/Stability to sunlight, nor
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6314/Oxidizing or reducing ac
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6315/Flammability
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6320/Corrosion characteristic
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.7200/Melting point/melting ra
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.7220/Boiling point/boiling rang
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.7300/Density/relative density
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.7550/Partition coefficient (n-o
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.7840/Water solubility: Colum
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.7950/Vapor pressure

BARCODE: D330539; Reg. No. : 19713-ANN PRODUCT: Pendimethalin Technical

Date: December 11, 2006

SUBJECT: FEE. Product Chemistry Review of Pendimethalin Technical TGA/MUP

FROM: Shyam B. Mathur, PhD
Product Chemistry Team Leader
Technical Review Branch/RD (7505P)

TO: Ching-Tsen / Jim Tompkins, RM 25
Herbicide Branch / RD (7505P)

S. B. Mathur
12/11/06
dm

DP BARCODE: D330539
DECISION No.: 368407
File Symbol No.: 19713-ANN
PRODUCT: Pendimethalin Technical TGA/MUP
PCC: 108501
REGISTRANT: Drexel Chemical Co.
USE: Herbicide

INTRODUCTION:

The registrant has submitted the product chemistry data to support the registration application of the proposed Pendimethalin Technical TGA/MUP produced by [REDACTED]. The product chemistry data corresponding to 830 series subgroup A and Subgroup B have been submitted under MRID Nos. 468613-01 and 468613-02. The registrant has also submitted a CSF for basic formulation (dated 03-07-06) and the product label. TRB has been asked to evaluate the product chemistry data submitted for the proposed TGA/MUP.

SUMMARY OF FINDINGS:

1. The registrant has submitted a Confidential Statement of Formula for basic formulation (dated 03-07-06) for the Pendimethalin Technical TGA / MUP. The average purity of the technical/MUP is 96.0%, as determined by the five batch analysis. The proposed certified limits for the AI are based on the standard certified limits as set forth in 40CFR§158.175(b)(2), where as the certified limits for the impurities are based on the five batch analysis. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) satisfy the data requirements of 40CFR§158.155 and 158.175 respectively [MRID No. 468613-01].
2. The product chemistry data submitted corresponding to guideline reference 830.1600 (description of material used to produce the product) satisfy the data requirements of 40CFR§ 158.160 [MRID No. 468613-01].
3. The product chemistry data submitted corresponding to guideline reference 830.1620 (description of production process) satisfy the data requirements for 40CFR§158.162. The Pendimethalin Technical TGA/MUP was manufactured in three step integrated batch process. The details of the production process have been provided which included the amounts of each starting material used in the process, description of the equipment used, the reaction conditions (temperature, pH, etc.) and the yields of the final product and the steps taken to control the quality of the product [MRID No. 468613-01].

BARCODE: D330539; Reg. No. : 19713-ANN PRODUCT: Pendimethalin Technical

Table t. Manufacturing and Impurity Data for Pendimethalin TGA/MUP				
GLN	Requirement	MRID	Status	Details and/or Deficiency
830.1550	Product Identity and composition	Basic CSF (03-07-06)	A	The NC of AI (96.0%) is supported by 5 batch analysis & agrees with the label claim NC (96%). [REDACTED] impurities ($\geq 0.1\%$) are listed on the CSF.
830.1600	Description of materials used to produce the product	468613-01	A	The description & composition for all the starting materials used to produce the imidacloprid technical/mup have been provided by the registrant
830.1620	Description of production process	468613-01	A	The AI was produced in three stage integrated batch process followed. The production process has been described in full details. The reaction conditions, amounts of chemicals in each step, duration of time, and the yields in each step have been provided. The QA steps involved in each step have been described.
830.1670	Discussion of formation of impurities	468613-01	A	The registrant has provided the complete mechanisms of formation, quantification and identification of all the impurities present at the levels of $\geq 0.1\%$. Total of [REDACTED] impurities have been listed on the CSF at levels of [REDACTED]. One impurity of tox concern (nitroso) is listed on the CSF, the registrant has stated that this impurity was not detected at LOD of [REDACTED]
830.1700	Preliminary analysis	468613-01	A	Five representative batches of the pendimethalin technical/mup were analyzed for percent active ingredient and the impurities. The purity of the AI in the TGA was determined by GC-FID method. The HPLC-UV (240 nm) with external standard method was used to identify & quantify the nitroso impurity. The five batch analysis supported the CSF for basic formulation.
830.1750	Certified limits	468613-01	A	The proposed certified limits for the AI are based on the standard certified limit table. Whereas proposed certified limits for the impurities are based on five batch analysis results.
830.1800	Enforcement analytical method	468613-01	A	The GC-FID method was used for the determination of the AI content in the TGA/MUP. The method was validated for precision, linearity, accuracy, LOD, & LOQ.
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)				

BARCODE: D330539; Reg. No. : 19713-ANN PRODUCT: Pendimethalin Technical

830 Series Subgroup B (Physical-Chemical Properties)

Table 2: Physical and Chemical Properties of : Pendimethalin TGA/MUP

GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	Color	468613-02	A	Dark amber or orange to brown
830.6303	Physical state	" " "	A	Crystalline solid
830.6304	Odor	" " "	A	Odorless
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	" " "	A	Stable at normal & elevated temperatures. Stable in original containers to acid and basic conditions.
830.6314	Oxidation/reduction: chemical incompatibility	" " "	A	None
830.6315	Flammability	" " "	A	Non-flammable
830.6316	Explosibility	" " "	A	Not known to have explosive properties
830.6317	Storage stability	" " "	A	2 year study indicate it to be stable
830.6319	Miscibility		NA	
830.6320	Corrosion characteristics	468613-02	A	Non-corrosive
830.7000	pH	" " "	A	Product is not dispersible in water
830.7050	UV/Visible absorption			
830.7100	Viscosity		NA	
830.7200	Melting point	468613-02	A	43-57°C
830.7220	Boiling point	" " "	A	Approximately 330°C
830.7300	Density	468613-02	A	1.170 g/ml at 25°C
830.7370	Dissociation constants in water (DC)	468613-02	A	No DC is observed for the test substance in aqueous solution
830.7550	Partition coefficient	468613-02	A	K o/w = 152,000
830.7840	Water solubility:	468613-02	A	See Note 1
830.7950	Vapor pressure	468613-02	A	< 9.4 x 10 ⁻⁶ mm Hg @ 25°C

A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Upgrade (additional information required)

Note 1. 830.7840. Solubility in water & organic solvents: (MRID No. 468613-02)

Solubility in water (mg/L at 25°C): 0.275

The solubility was determined in the following organic solvents (g/l at 25°C):

n-Heptane: 138.0 ; Xylene: 628.0; Toluene: 128.40; Acetone: 700.0; Isopropyl alcohol: 77.0;

Corn oil: 148.0.

BARCODE: D330539; **Reg. No. :** 19713-ANN **PRODUCT:** Pendimethalin Technical

830.1800. Enforcement of analytical method: (MRID No. 468613-01)

The pendimethalin active ingredient was determined by GC-FID method.

Equipment & Parameters

GC system: HP Series II Gas Chromatograph equipped with FID and PC based data system.

Column: DB-35 wide bore capillary column, 30 m x 0.53 mm, 5 µm

Column-oven temperature: 70°C (0 min) to 250°C (@ 25°C, 10 minutes)

Injector temperature: 250°C

Detector temperature: 270°C

Gas flow: Nitrogen (12 ml/min); Hydrogen (40 ml/min); Air (300 ml/min)

Sample size: 1.0 µL

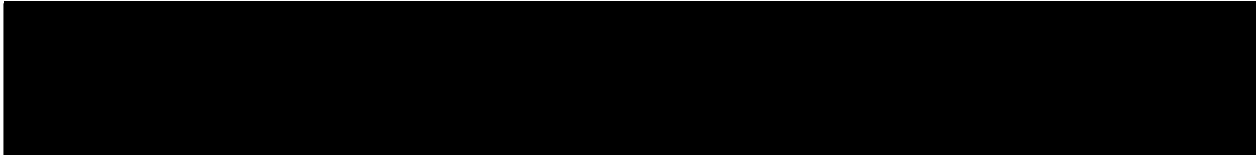
Retention time: Pendimethalin = 14.4 minutes

Manufacturing process information may be entitled to confidential treatment

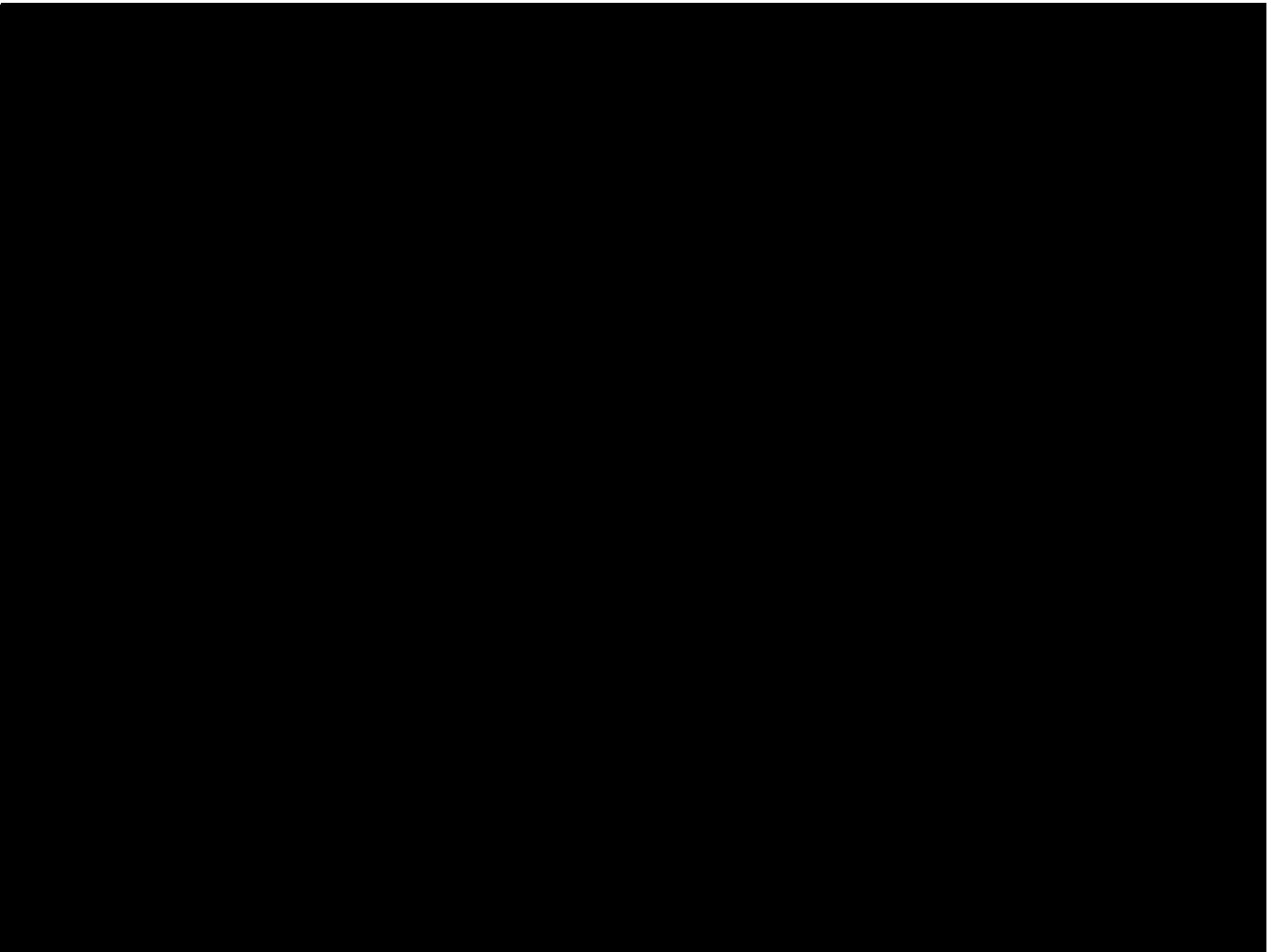
BARCODE: D330539; Reg. No. : 19713-ANN PRODUCT: Pendimethalin Technical

CONFIDENTIAL APPENDIX

830.1600. Description of Materials used to produce the product: (MRID No. 468613-01)



830.1620. Description of production process: (MRID No. 468613-01)





Drexel

Pendimethalin Technical

Herbicide

For use in Turfgrasses, Ornamentals, Landscape or Grounds Maintenance, Grass Grown for Seed, and Noncropland Areas

ACTIVE INGREDIENT:

Pendimethalin	96.0%
OTHER INGREDIENTS:	4.0%
TOTAL:	100.0%

Contains nitrosoamines at levels less than 100 ppm.

KEEP OUT OF REACH OF CHILDREN CAUTION

See FIRST AID Below

EPA REG. NO. 19713-

EPA EST. NO.

Net Contents: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.

Note: Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, OR EXPOSURE)
CALL CHEMTREC: 1-800-424-9300

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, Drum may retain solid, liquid, and/or residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Each formulator is responsible for obtaining EPA registration for their formulated product(s).

Only for formulation into a herbicide for the following uses:

Grass grown for seed, Landscape or Ground maintenance, Noncropland areas, Ornamentals, and Turfgrasses.

This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food, or feed, by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.

CONTAINER DISPOSAL:

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Open dumping is prohibited.

WARRANTY - CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE express or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972



Drexel

Pendimethalin Technical

Herbicide

For use in Turfgrasses, Ornamentals, Landscape or Grounds Maintenance, Grass Grown for Seed, and Noncropland Areas

ACTIVE INGREDIENT:

Pendimethalin	96.0%
OTHER INGREDIENTS:	4.0%
TOTAL:	100.0%

Contains nitrosoamines at levels less than 100 ppm.

KEEP OUT OF REACH OF CHILDREN CAUTION

See FIRST AID Below

EPA REG. NO. 19713-_____

EPA EST. NO. _____

Net Contents: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.

Note: Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, OR EXPOSURE)
CALL CHEMTREC: 1-800-424-9300

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, Drum may retain solid, liquid, and/or residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Each formulator is responsible for obtaining EPA registration for their formulated product(s).

Only for formulation into a herbicide for the following uses:

Grass grown for seed, Landscape or Ground maintenance, Noncropland areas, Ornamentals, and Turfgrasses.

This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food, or feed, by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.

CONTAINER DISPOSAL:

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Open dumping is prohibited.

WARRANTY - CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE express or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972

DATA PACKAGE BEAN SHEET

Date: 29-Jun-2006

Page 1 of 2

Decision #: 368407

DP #: (330539)

*** Registration Information ***

Registration: 19713-ANN - PENDIMETHALIN TECHNICAL

Company: 19713 - DREXEL CHEMICAL CO

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# PY1 S-7337

Risk Manager Reviewer: Ching-Tsen Bien CBIEN

Sent Date: _____

Calculated Due Date: 01-Jan-2007

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (R31) NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMIST

Ingredients: 108501, Pendimethalin(98%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 29-Jun-2006

Due Back: _____

DP Ingredient: 108501, Pendimethalin

DP Title: Drexel Pendimethalin Technical Herbicide

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 02-Dec-2006

Team Name: _____

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

The Drexel Chemical Company has a new source for pendimethalin technical. Please review the enclosed product chemistry package and determine its acceptance for registration.

MRID#: 468613-01, 468613-02

DP#: (330539)

*** Studies Sent for Review ***

Decision#: (368407)

MRID	Citation Reference	Guideline
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1550/Product Identity and cor
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1600/Description of materials
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1620/Description of production
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1670/Discussion of formation
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1700/Preliminary analysis
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1750/Certified limits
46861301	Wherry, K. (2006) Product Identity, Composition and Analysis: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co and Rallis India Limited. 116 p.	830.1800/Enforcement analytical
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6302/Color
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6303/Physical state
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6304/Ddor
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6313/Stability to sunlight, non
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6314/Oxidizing or reducing ac
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6315/Flammability
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.6320/Corrosion characteristic
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.7200/Melting point/melting ran
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.7220/Boiling point/boiling rang
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.7300/Density/relative density
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.7550/Partition coefficient (n-o
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.7840/Water solubility: Colum
46861302	Wherry, K. (2006) Physical and Chemical Properties: Drexel Pendimethalin Technical. Project Number: DRXL/200602. Unpublished study prepared by Drexel Chemical Co. 9 p.	830.7950/Vapor pressure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 21, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DREXEL CHEMICAL CO
1700 CHANNEL AVENUE, PO Box 13327
MEMPHIS, TN 38113-0327

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 14-JUN-06. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3					
S:	795431	Resubmission:	<input type="radio"/> Yes <input checked="" type="radio"/> No		
Regulatory Type:	Product Registration - Section 3	Fee For Service:	<input checked="" type="radio"/> Yes <input type="radio"/> No	<div>Print Letter</div> <div>Enter More Information</div> <div>Tracking</div>	
Application Type:	New Registration	Billable:	<input checked="" type="radio"/> Yes <input type="radio"/> No		
Company:	19713 DREXEL CHEMICAL CO		V		
Risk Manager:	Registration Division Risk Management Team 25				
Product #:	19713-A1111	Product Name:	DREXEL PENDIMETHALIN TECHNICAL		
Override#:					
Me Too Section3:		Me Too Product Name:			
Application Date:	12-Jun-2006	OPP Rec'd Date:	14-Jun-2006	<div>Receipt Content</div> <div>Study</div>	
Front End Date:	15-Jun-2006	Risk Manager Send Date:			
FFS Due Date:		Negotiated Due Date:			
OPP Target Date:					
Fast Track:	<input type="checkbox"/>	New Ingredient:	<input type="checkbox"/>		
Receipt Description:	<div>Me-too registration.</div> <div></div>				
Form A:	<input type="checkbox"/>	Signature Date:		Form B:	<input type="checkbox"/>

Non-Fast Track
 Fee for Service - Rec'd \$4200.00

**Drexel Chemical Company**

June 12, 2006

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive
Arlington, VA 22202

ATTN: MR. JIM TOMPKINS, PM 25/Herbicide Branch

Re: *Application for a ME-TOO Pesticide Registration*
DREXEL PENDIMETHALIN TECHNICAL (EPA File Symbol 19713 -)

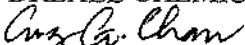
Reference is made to the above. Herewith:

1. Completed EPA Form 8570-1
2. Two (2) copies of the basic Formulation CSF
3. Certification with Respect to Citation of Data
4. Data Matrix
6. Five (5) copies of the proposed label (PendiTechSP-0306Pending).
7. Three (3) copies of the following reports:
 - 46861301** i) Product Identity, Composition, Analysis, Physical and Chemical Characteristics of Pendimethalin Technical (OPPTS Guidelines: 830.1550, 1670, 1750, 1800)
 - 46861302** ii) Physical and Chemical Properties of Pendimethalin Technical (OPPTS Guidelines: 830.6302, 6303, 6304, 6313, 6314, 6315, 6316, 6317, 6318, 6319, 6320, 6321, 7000, 7200, 7220, 7300, 7370, 7550, 7840, 7950)

We believe that Action Code R30 which carries a \$1,050 service fee applies to this application.

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Respectfully yours,
DREXEL CHEMICAL COMPANY


Luz G Chan
Registration Manager

**Drexel Chemical Company**

June 12, 2006

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive
Arlington, VA 22202

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Re: *Application for a ME-TOO Pesticide Registration*
DREXEL PENDIMETHALIN TECHNICAL (EPA File Symbol 19713 -)

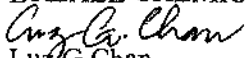
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 - 46881302** ii) Physical and Chemical Properties of Pendimethalin Technical (OPPTS Guidelines: 830.6302, 6303, 6304, 6313, 6314, 6315, 6316, 6317, 6318, 6319, 6320, 6321, 7000, 7200, 7220, 7300, 7370, 7550, 7840, 7950)

We believe that Action Code R30 which carries a \$1,050 service fee applies to this application.

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Respectfully yours,
DREXEL CHEMICAL COMPANY


Luz G Chan
Registration Manager



Drexel

Pendimethalin Technical

Herbicide

For use in Turfgrasses, Ornamentals, Landscape or Grounds Maintenance, Grass Grown for Seed, and Noncropland Areas

ACTIVE INGREDIENT:

Pendimethalin 96.0%

OTHER INGREDIENTS: 4.0%

TOTAL: 100.0%

Contains nitrosoamines at levels less than 100 ppm.

KEEP OUT OF REACH OF CHILDREN CAUTION

See FIRST AID Below

EPA REG. NO. 19713-_____

EPA EST. NO. _____

Net Contents: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.

Note: Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

**FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, OR EXPOSURE)
CALL CHEMTREC: 1-800-424-9300**

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, Drum may retain solid, liquid, and/or residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Each formulator is responsible for obtaining EPA registration for their formulated product(s).

Only for formulation into a herbicide for the following uses:

Grass grown for seed, Landscape or Ground maintenance, Noncropland areas, Ornamentals, and Turfgrasses.

This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food, or feed, by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility.

CONTAINER DISPOSAL:

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Open dumping is prohibited.

WARRANTY - CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE express or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 19, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-368407
EPA File Symbol or Registration Number: 19713-ANN
Product Name: DREXEL PENDIMETHALIN TECHNICAL
EPA Receipt Date: 14-Jun-2006
EPA Company Number: 19713
Company Name: DREXEL CHEMICAL CO

Iuz G. Chan
DREXEL CHEMICAL CO
1700 CHANNEL AVENUE, PO Box 13327
MEMPHIS, TN 38113-0327

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R31

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT
CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

Please remit payment in the amount of: \$ 4,200 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

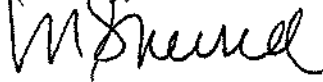
By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Sincerely,



Front End Processing Staff
Information Technology & Resources Management Division



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713- <u>ANN</u>	2. EPA Product Manager JIM TOMPKINS	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PENDIMETHALIN TECHNICAL	PM# 25/Herbicide Branch	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>241-245</u> Product Name <u>Prowl Herbicide Technical</u>	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.


Explanation: Use additional page(s) if necessary. (For section I and Section II.)

An application for a Me-Too registration is submitted. Details of this submission are in the accompanying cover letter. We believe Action Code R30 (i.e. \$1,050 Service Fee) applies to this submission. Thank you.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) <u>Steel</u>	
If "Yes" Unit Packaging wgt. _____ No. per container _____		If "Yes" Package wgt. _____ No. per container _____			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 55 GAL; BULK		5. Location of Label Directions <input checked="" type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name LUZ G CHAN	Title REGISTRATION MANAGER	Telephone No. (Include Area Code) (501) 774-4370
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment, or both under applicable law.		6. Date Application Received (Stamped)
2. Signature  Digitally signed by Luz chan DN: cn=Luz chan, o=US, ou=Drexel Chemical Co. Date: 2006.05.04 14:43:49 -05'00'	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date June 12, 2006	



Drexel Chemical Company

June 12, 2006

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive
Arlington, VA 22202

ATTN: MR. JIM TOMPKINS, PM 25/Herbicide Branch

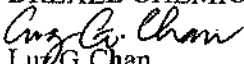
Re: *Application for a ME-TOO Pesticide Registration*
DREXEL PENDIMETHALIN TECHNICAL (EPA File Symbol 19713 -)

Reference is made to the above. Herewith:

1. Completed EPA Form 8570-1
2. Two (2) copies of the basic Formulation CSF
3. Certification with Respect to Citation of Data
4. Data Matrix
6. Five (5) copies of the proposed label (PendiTechSP-0306Pending).
7. Three (3) copies of the following reports:
 - i) Product Identity, Composition, Analysis, Physical and Chemical Characteristics of Pendimethalin Technical (OPPTS Guidelines: 830.1550, 1670, 1750, 1800)
 - ii) Physical and Chemical Properties of Pendimethalin Technical (OPPTS Guidelines: 830.6302, 6303, 6304, 6313, 6314, 6315, 6316, 6317, 6318, 6319, 6320, 6321, 7000, 7200, 7220, 7300, 7370, 7550, 7840, 7950)

We believe that Action Code R30 which carries a \$1,050 service fee applies to this application.

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Respectfully yours,
DREXEL CHEMICAL COMPANY

Luz G Chan
Registration Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Drexel Chemical Company, P.O. Box 13327, Memphis, TN 38113-0327 (Tel 901 774-4370)	EPA Registration Number/File Symbol 19713-
Active Ingredient(s) and/or representative test compound(s) Pendimethalin	Date May 4, 2006
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial non-food crops	Product Name DREXEL Pendimethalin Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☒ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

Submission of a Me-Too registration application

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☒ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements)

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Luiz G Chan

Digitally signed by Luiz Chan
 DN: cn=Luiz Chan, o=USE, ou=Drexel Chemical Co.
 Date: 2006.05.04 13:48:52 -0500

Date

5/4/2006

Typed or Printed Name and Title

LUZ G CHAN, Registration Manager




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date May 4, 2006			EPA Reg No./File Symbol 19713-		Page 1 of 3
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient PENDIMETHALIN					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE ALL		CITE ALL	BASF CORPORATION	Pay	
CITE ALL		CITE ALL	Spray Drift Task Force	Per	
CITE ALL		CITE ALL	Outdoor Residential Exposure Task Force	Per	
CITE ALL		CITE ALL	Agricultural Reentry Task Force	Per	
CITE ALL		CITE ALL	Agricultural Handlers Exposure Task Force	Per	
PRODUCT SPECIFIC DATA:				Own	
830.1550	Chemical identity	TBD	Drexel	Own	
830.1600	Description of materials used to produce the product	TBD	Drexel	Own	
830.1620	Description of production process	TBD	Drexel	Own	
830.1670	Discussion of formation of impurities	TBD	Drexel	Own	
830.1700	Preliminary analysis	TBD	Drexel	Own	
830.1750	Certified limits	TBD	Drexel	Own	
830.1800	Enforcement analytical method	TBD	Drexel	Own	
830.6302	Color	TBD	Drexel	Own	
Signature  Digitally signed by Luz chan DN: cn=Luz chan, o=US, ou=Drexel Chemical Co. Date: 2006.05.04 13:51:41 -05'00'			Name and Title LUZ G CHAN, REGISTRATION MANAGER		Date 5/4/2006




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DATA MATRIX

Date MAY 4, 2006			EPA Reg No./File Symbol 197 f3-		Page 2 of 3
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient PENDIMETHALIN					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6303	Physical state	TBD	Drexel	Own	
830.6304	Odor	TBD	Drexel	Own	
830.6313	Stability to normal elevated temperatures	TBD	Drexel	Own	
830.6314	Oxidation/reduction; chemical incompatibility	TBD	Drexel	Own	
830.6315	Flammability	TBD	Drexel	Own	
830.6316	Explosibility	TBD	Drexel	Own	
830.6317	Storage stability	TBD	Drexel	Own	
830.6318	Viscosity	TBD	Drexel	Own	
830.6319	Miscibility	TBD	Drexel	Own	
830.6320	Corrosion characteristics	TBD	Drexel	Own	
830.6321	Dielectric breakdown voltage	TBD	Drexel	Own	
830.7000	pH	TBD	Drexel	Own	
830.7050	UV/Visible absorption	TBD	Drexel	Own	
830.7200	Melting point	TBD	Drexel	Own	
830.7220	Boiling point	TBD	Drexel	Own	
Signature 			Name and Title LUZ G CHAN, REGISTRATION MANAGER		Date 5/4/2006

Digitally signed by Luz Chan
DN: cn=Luz Chan, c=US, o=Drexel Chemical Co.
Date: 2006.05.04 13:58:13 -05'00'



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Date May 4, 2006	EPA Reg No./File Symbol f97f3-	Page 3 of 3
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327	Product DREXEL PENDIMETHALIN TECHNICAL	

[illegible]

Signature	 Digitally signed by Luz chan DN: cn=Luz chan, c=US, o=Orexel Chemical Co. Date: 2006.05.04 14:16:23 -05'00'	Name and Title	Date
		LUZ G CHAN, REGISTRATION MANAGER	MAY 4, 2006




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DATA MATRIX

Date May 4, 2006		EPA Reg No./File Symbol 197 f3-		Page 1 of 3	
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327		Product DREXEL PENDIMETHALIN TECHNICAL			
Ingredient PENDIMETHALIN					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			BASF CORPORATION	Pay	
			Spray Drift Task Force	Per	
			Outdoor Residential Exposure Task Force	Per	
			Agricultural Reentry Task Force	Per	
			Agricultural Handlers Exposure Task Force	Per	
				Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
		Drexel	Own		
Signature			Name and Title LUZ G CHAN, REGISTRATION MANAGER		Date 5/4/2006





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DATA MATRIX

Date MAY 4, 2006		EPA Reg No./File Symbol 19713-		Page 2 of 3	
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327		Product DREXEL PENDIMETHALIN TECHNICAL			
Ingredient PENDIMETHALIN					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
 			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
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			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
Signature			Name and Title LUZ G CHAN, REGISTRATION MANAGER		Date 5/4/2006



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Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327	Product DREXEL PENDIMETHALIN TECHNICAL	

Ingredient PENDIMETHALIN

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
 			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			Drexel	Own	
			BASF CORPORATION	PAY	

Signature	Name and Title LUZ G CHAN, REGISTRATION MANAGER	Date MAY 4, 2006
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